

VLADECK, RASKIN & CLARK, P.C.

JEREMIAH IADEVIAIA
(212) 403-7323

EMAIL: jiadevaia@vladeck.com

June 28, 2024

SO ORDERED

JUL 02 2024

VIA ECF

Hon. George B. Daniels
US District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Goldzweig v. Consolidated Edison Company of New York, Inc.
Case No. 1:20-cv-04297 (GBD)

HON. GEORGE B. DANIELS

Dear Judge Daniels:

We represent plaintiff Sharon Goldzweig (“plaintiff” or “Goldzweig”) in the above-captioned employment case against plaintiff’s former employer defendant Consolidated Edison Company of New York, Inc. (“Con Ed” or “defendant”). We write pursuant to Your Honor’s Individual Rule II.E. respectfully to request permission to redact and file under seal certain exhibits filed in connection with plaintiff’s papers opposing defendants’ motions for summary judgment.

Plaintiff respectfully requests permission to file Declaration of Jeremiah Iadeviaia dated June 28 2024 Exhibits 29, 30, 35, 43, 51, 66, 68. These exhibits are documents Con Edison has marked “Confidential” as documents that contain information concerning: 1) employee compensation; 2) confidential performance reviews of non-parties; 3) confidential agreements with non-parties; and 4) confidential EEOC proceedings.

Defendant has asked that plaintiff file these documents under seal consistent with plaintiff’s obligations under the parties’ Confidentiality Stipulation and Protective Order. (Dkt. 21) Plaintiff consents to defendant’s request.

In addition, plaintiff respectfully requests to file with redactions 1) plaintiff’s memorandum of law in opposition to defendant’s motion for summary judgment and 2) plaintiff’s response to defendant’s rule 56.1 and statement of additional material facts. The redactions are limited to those required to protect information identified as confidential in the above-referenced exhibits.

Respectfully submitted,



Jeremiah Iadeviaia

cc: All counsel of record (via ECF)